

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

JIANGSU GTIG ESEN CO., LTD.,

Plaintiff,

v.

AMERICAN FASHION NETWORK, LLC, AND JES
APPAREL, LLC,

Defendants.

**DECLARATION OF
XING, ZHANGJUAN IN
SUPPORT OF
PLAINTIFF'S MOTION
FOR DEFAULT
JUDGMENT BY THE
CLERK**

Civil Action No.
5:20-cv-00222 (MAD/ATB)

DECLARATION OF XING, ZHANGJUAN

Xing, Zhangjuan declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a Division Manager for the plaintiff in the above-captioned action, Jiangsu Gtig Esen Co., Ltd., (hereinafter "Plaintiff").

2. I make this declaration in support of Plaintiff's Motion for Default Judgment by the Clerk against the defendants, American Fashion Network, LLC and JES Apparel, LLC (collectively, "Defendants") pursuant to Rule 55(a) of the Federal Rules of Civil Procedure and Local Rule 55.2(a).

3. Defendants contracted with Plaintiff to manufacture, ship, and deliver a variety of garments (hereinafter "the Product") for Defendants upon Defendants' request. In exchange, Defendants agreed to pay Plaintiff for the garments ordered and provided.

4. Plaintiff delivered one hundred and sixty-four (164) invoices (hereinafter collectively the "Invoices") to Defendants for the Product that Plaintiff

ordered between July 13, 2017 and April 16, 2018 and that Plaintiff manufactured, shipped, and delivered for and on behalf of Defendants. See Dkt. No. 1.

5. Defendants have failed to remit full payment of the Invoices to Plaintiff.

6. As a result, at the time of the filing of the Complaint in this action, Defendants owed Plaintiff \$4,257,827.70 in unpaid Invoices. See Dkt. No. 1.

7. Since the filing of the Complaint, Plaintiff has received payment towards the Invoices for \$1,500.00.

8. As part of its Motion for Default Judgment, Plaintiff submits a Statement of Judgment as required by Local Rule 55.2(a) (the "Statement"). Attached as **Exhibit 1** is the Statement pursuant to Local Rule 55.2(a).

9. The amount shown in the Statement is justly due and owing and no part has been paid except as set forth in the Statement as required by Local Rule 55.2(a).

10. The disbursements sought to be taxed have been made in the action or will necessarily be made or incurred.

11. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 6th, 2020.

Zhangjiagang, China (location)

Xing Zhangjuan

Name: Xing Zhangjuan
Position: Division Manager
Jiangsu Gtig Esen Co., Ltd.

Declaration of Xing Zhangjuan, EXHIBIT 1

STATEMENT OF AMOUNTS DUE, WITHOUT INTEREST OR COSTS

Invoiced Amount:	\$	4,855,161.39
Amount Paid Towards Invoices by Defendants Prior to Complaint	\$	597,333.69
Principal Amount Due at Time of Complaint:	\$	<u>4,257,827.70</u>
Payment Credit Received April 2, 2020	\$	<u>1,500.00</u>
STATEMENT OF TOTAL AMOUNTS DUE, WITHOUT INTEREST OR COSTS:	\$	4,259,327.70

Dated: May 6, 2020